

18 AUG 2008

CERTIFIED MAIL

RETURN RECEIPT REQUESTED

Article No. 7006 2760 0000 8650 5736

Mr. Juan Somoano, P.G.  
Director, Operations  
5005 LBJ Freeway, Suite 1350  
Dallas, Texas 75244-6119

Dear Mr. Somoano:

Re: Occidental Chemicals (OCC) Interim Corrective Measures Implementation Report,  
Asbestos Surface Impoundment Solid Waste Management dated July 25, 2008.  
RCRA ID #KSD007482029

The Environmental Protection Agency (EPA) has reviewed your July 25, 2008, report which is in response to the EPA letter dated June 06, 2008 concerning the asbestos surface impoundment solid waste management unit (SWMU).

EPA appreciates OCC's timely submission of this revised report. EPA is approving this report with the condition that OCC submit a revised cover page along with page inserts that contain the requested information below.

Specific Comment:

1. Page 4-1 of this report states that "Until completion of the RFI and implementation of the final corrective measures, an environmental review of major excavation or construction projects will be required by the facility as part of the current Management of Change (MOC) process and as a form of administrative control near the ASI in order to protect human health and prevent potential environmental impact."

In addition, section 4 also proposes that—until the asbestos surface impoundment can be fully assessed and delineated—major excavation or construction projects near the impoundment will be required to receive an environmental review. Insufficient detail is provided as to how these proposals will be communicated, implemented, documented, and enforced. As examples, the closure document does not include inspection checklists or requirements, administrative control requirements, decision matrices, responsible persons or positions, or health and safety requirements. Section 4 must be revised to specify how and under whose authority these proposals will be communicated, implemented, documented, and enforced.

RCAP  
GARRETT  
8/17/08

RCAP  
GRAVATT  
8/18/08

RCAP  
LUGANTZ  
8/18/08

*LSH*



OCC should provide additional detail or clarify the meaning of this section. Please provide a detailed explanation within 30 days receipt of this letter. If you have any questions you may reach me at (913) 551-7159 or at [Garrett.David@epa.gov](mailto:Garrett.David@epa.gov).

Sincerely,

David Garrett  
Environmental Scientist  
RCRA Corrective Action & Permits Branch  
Air & Waste Management Division

cc: Lisa Thurman  
Occidental Chemicals  
Devin Pollock  
KDHE-BWM

AWMD/RCAP:cas:h:/DGARRETT/OCC-EPAFINALASIINTERIMCMIREPORTV2.DOC/081508



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 7  
901 NORTH 5TH STREET  
KANSAS CITY, KANSAS 66101

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Sincerely,

A handwritten signature in black ink that reads "David Garrett". The signature is written in a cursive style with a large, stylized "D" and "G".

David Garrett  
Environmental Scientist  
RCRA Corrective Action & Permits Branch  
Air & Waste Management Division

cc: Lisa Thurman  
Occidental Chemicals  
Devin Pollock  
KDHE-BWM

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Juan Somoano  
Glenn Springs Holdings, Inc.  
5005 LBJ Freeway  
Dallas, TX 75244

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AUG 25 2008

Garrett - RCAP

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PS Form 3800, August 2006 (*Reverse*) PSN 7530-02-000-9047